

LEGAL & BUSINESS *Services*

Head of Service Susan De Val, LLB, Solicitor

Our Ref: SDV/raj/110
Please ask for: Susan De Val
Direct Line: (01245) 606521

Chelmsford
BOROUGH COUNCIL
Civic Centre Duke Street
Chelmsford Essex CM1 1JE
DX 123305 Chelmsford 7
Telephone: 01245 606606
Facsimile: 01245 606245

29 January 2004

Dear Sir,

Cranham Road, Little Waltham

The Council's attention has been drawn to a defamatory statement made about one of its officers and apparently published by you via an email through the Roma Network in connection with the Council's recent action to clear land at Cranham Road. The statement in question concerns Christine Lyons and is that "she is notorious for her anti-gypsy activity while working for Basildon Council".

The Council fully recognises the right of any person or group to express and publicise their views about its actions and that such freedom of expression extends to the right to campaign and protest through any lawful means available. However such right does not extend to making actionable comments about individual Council officers.

Both the Council and Mrs Lyons strongly refute the allegation implicit in your statement that she has at any time acted in an unprofessional, and possibly racist manner, and consideration is accordingly being given to legal action against you and any other parties involved in the making and dissemination of this defamatory statement.

In the meantime I must insist that you refrain from making any further defamatory or unsubstantiated allegations about Mrs Lyons or about any other Council officer, and agree to take action to retract and disassociate yourself and the Roma Federation from any such statements.

Yours Faithfully



Susan De Val
Head of Legal Services

Gratton Puxon
Trans European Roma Federation
1 John Harper Street
Colchester
CO1 1RP



2003-2004
Quality of the Built Environment



INVESTOR IN PEOPLE

Our Ref: KB/JW/50512/1
Your Ref:
Date: 06 February 2004

Email: kbarnes@tsplegal.com

Mr M Easteal
Chief Executive
Chelmsford Borough Council
Civic Centre
Duke Street
Chelmsford
CM1 1JE

Dear Sir

Our client: Miss Roseanne Sheridan
Re: Damage to caravan

We act for Miss Roseanne Sheridan who has consulted us with regard to damage to her caravan.

Miss Sheridan's caravan was on the Cranham Road site in Little Waltham, Essex. She, amongst others, was evicted from the site by bailiffs acting on your behalf on 26 January 2004.

During the eviction her caravan was moved by Constant & Co Ltd acting on your behalf. We understand that during the moving of the caravan considerable damage to the structure occurred. In particular there was damage to the back of the caravan and to the flooring.

When the caravan was removed from the site our client was informed that it would either be moved to a caravan site in Epsom or to a storage facility at South Mimms. The caravan was not moved to either place but was left at the side of Cranham Road overnight. At some point when the caravan was at the side of the road it was destroyed by fire. We understand that the fire led to the total destruction of the caravan and its contents.

Your agents were negligent in failing to move the caravan to a place of safe storage and/or in failing to ensure that the goods were kept safely at all. Your agents are therefore liable in negligence for the damage to the caravan, and you are vicariously liable for their actions.

The caravan was bought new less than a year ago for the price of £16,000. The contents of the caravan included all of our clients and her partner's clothes, their childrens' clothes, all bedding, cooking equipment, etc. Also in the caravan was a collection of Waterford Crystal, a collection of Crown Derby and a t.v./video and dvd player. Our client estimates the value of the contents of the caravan to be in the region £3,000.

Cont'd.....

Our client requires compensation for the loss of her property whilst in your keeping in the sum of £19,000. Should such compensation not be received within 14 days of the date of this letter our client will be forced to consider legal action against you. Any such action will include a claim for interest, costs and damages for inconvenience suffered by our client.

We confirm that a letter before action has also been sent to Chelmsford Borough Council and we enclose a copy for your information.

Yours faithfully

THOMPSON SMITH & PUXON

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THOMPSON SMITH & PUXON
SOLICITORS

4 North Hill Colchester Essex CO1 1EB DX 3617 Colchester
Tel 01206 574431 Fax 01206 563174 Website www.tsplegal.com

Our Ref: KB/SJC/50512/1
Your Ref:
Date: 19 February 2004

Email: kbarnes@tsplegal.com

Miss R Sheridan and Mr P Purcell
c/o Mr Gratton Puxon
1 John Harper Street
Colchester
CO1 1RP

Dear Roseanne and Patrick

re: Damage to your caravan

I received a letter from Chelmsford Borough Council regarding your homeless application. I think they have sent this to me because they have no other contact address for you.

As we discussed when we met, I am not able to advise you with regard to this application and I have written to Chelmsford Borough Council to point this out to them. I enclose a copy of their letter and I suggest you find suitably qualified solicitors to advise you. Alternatively, it would appear that you could provide the information direct to them. I am unable to advise you with regard to homeless issues as I do not specialise in that area.

Yours sincerely

Kate Barnes

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Community
Legal Service



R.M. Gillespie D.S. Welham¹ M.G. Wilson² J.G. Wilson^{3,4} M.J.S. Price^{5,6} R.S. Porter⁷ M.C.A. Liddy¹
M.W.H. Cooksley M.A. Fedeyko S.J. Webb³ B.M. Tooke R.G. Baldwin A.J. Wilson

1. Member of Society of Trust and Estate Practitioners 2. Diploma in Agriculture Law 3. Member of Law Society Personal Injury Panel 4. Member of Law Society Clinical Negligence Panel
5. Accredited Specialist Solicitors Family Law Association 6. Member of Law Society's Family Panel 7. Higher Court Advocate

27 FEB 2004

CONSTANT & CO

Investigators and Bailiffs

Criminal, Civil, Matrimonial, Process and Certificated Bailiffs

Our Ref: BEL/SAS
Your Ref: KB/JW/50512/1

26 February, 2004

Thomson Smith & Puxon
Solicitors
DX 3617
COLCHESTER

Crown Chambers, 66 Harpur Street
Bedford MK40 2RA
Tel: 01234 340091 DX5641 Bedford
Fax: 01234 301299.
Email: constant@kbnet.co.uk
Website: www.constantand.co.uk

Dear Sirs

Re: Your Client – Roseanne Sheridan

We refer to your letter of 23 February 2004 in connection with the above named.

It is noted that in the heading you continue to refer to "damage to caravan" to which we now take great exception. The allegation was false and malicious and possibly an attempted criminal deception. We are now giving consideration to what action we should take against your client, Patrick Purcell and Gratton Puxon who it would appear may have conspired together in formulating this claim.

Perhaps you would be good enough to write back and explain why you have been instructed to take the matter no further.

Yours faithfully



CONSTANT & CO

Also at Milton Keynes, Cambridge, Aylesbury, Huntingdon, Kettering, Luton, Watford and Stevenage.

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4 North Hill Colchester Essex CO1 1EB DX 3617 Colchester
Tel 01206 574431 Fax 01206 563174 Website www.tsplegal.com

Our Ref: KB/JW/50512/1
Your Ref:
Date: 01 March 2004

Email: kbarnes@tsplegal.com

Mr Gratton Puxon
1 John Harper Street
Colchester
Essex
CO1 1RP

Dear Mr Puxon

Re: Roseanne Sheridan

Following your recent telephone message I wrote to Constant & Co and Zurich Municipal to say that we would not be taking this matter any further. I have received a reply from Constant & Co and I enclose a copy. I have no idea whether they will take any further action but you should be aware of the possibility.

I enclose a further copy of the letter which you may pass to Roseanne Sheridan when you next see her.

I do not, for the time being, propose to reply to Constant & Co not least because I do not have sufficient information to reply more fully.

Yours sincerely

Kate Barnes

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